

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

IN RE:

DARRALL A. GRIFFIN
Debtor

Case Number: 16-10580-RGM
Chapter 13

WILMINGTON SAVINGS FUND SOCIETY, FSB

Movant

v.

DARRALL A. GRIFFIN,

Respondent

DEBTOR'S RESPONSE TO MOVANT'S MOTION FOR RELIEF FROM STAY

COMES NOW, the Debtor, DARRALL A. GRIFFIN, by and through undersigned counsel, Tommy Andrews, Jr., P.C. and Tommy Andrews Jr. and in response to Movant's said Motion for Relief from Stay states as follows:

1. Debtor generally admits the allegations contained in paragraph 1.
2. Debtor generally admits the allegations contained in paragraph 2.
3. Debtor generally admits the allegations contained in paragraph 3.
4. Debtor generally admits the allegations contained in paragraph 4.
5. Debtor generally admits the allegations contained in paragraph 5.
6. Debtor generally admits the allegations contained in paragraph 6.
7. Debtor generally admits the allegations contained in paragraph 7.
8. Debtor denies the allegations contained in paragraph 8 and demands strict proof thereof.
9. Debtor denies the allegations contained in paragraph 9 and demands strict proof thereof.
10. Debtor denies the allegations contained in paragraph 10 and demands strict proof thereof.
11. Debtor denies the allegations contained in paragraph 11 and demands strict proof thereof.
12. Debtor neither admits nor denies the allegations contained in paragraph 12.
13. Debtor denies the allegations contained in paragraph 13 and demands strict proof thereof.

Wherefore, the Debtor prays that the Movant's Motion for Relief from Stay imposed by 11 U.S.C. §362 be denied and for such other and further relief as this Honorable Court deems just and proper under the law.

Respectfully Submitted,
Darrall A. Griffin,
By Counsel,

/s/ Tommy Andrews
Tommy Andrews, Jr. #28544
Marcelo R. Michel #47818
Tommy Andrews, Jr., P.C.
122 North Alfred Street
Alexandria, Virginia 22314
(703) 838-9004

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of August, 2016, I mailed, first class, postage prepaid or sent via the electronic court filing system a copy of the foregoing Debtor's Response to Movant's Motion for Relief from Stay to:

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/s/ Tommy Andrews
Tommy Andrews, Jr., Esq.
Marcelo R. Michel, Esq.